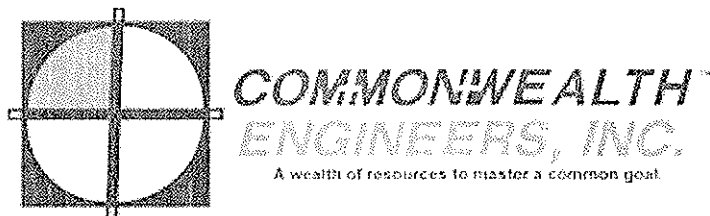


WU, LAWRENCE

From: Don Larson [dlarson@contactcei.com]
Sent: Wednesday, December 03, 2008 7:57 AM
To: WU, LAWRENCE
Cc: Higginbotham, Paul; STEVENS, MARY ANN; Mark Downey
Subject: NPD # Water - 17
Attachments: CSO Sewer Ban NPD; Town of Lowell IN0023621 LTCP-hzs-10-23-2008.tif



Nonrule Policy Document # Water - 17:
Larry Wu, Rules Section Chief
Office of Water Quality
Indiana Department of Environmental Management
100 N. Senate Ave.
Indianapolis, IN 46204
FAX: (317) 232-8637
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Good Morning Larry,

In review of the subject Draft NPD (attached) re: CSO Capacity Analysis I had some comments that could clarify the NPD's application to CSO communities that:

- 1) utilize wet weather equalization (EQ),
- 2) are Waste Stabilization Lagoon (WSL) systems, or
- 3) Utilize wet weather "Secondary Equivalence" treatment.

Possibly the addition some off ramp language that indicates if EQ is used, the bleed back rate to the WWTP will be hydraulically evaluated along w/ the WWTP sustained peaking factor to determine overflow duration on a case by case basis.....also WSL's present a similar situation due their storage potential behind a freeboard suggesting that WSL's should also be looked at on a case by case situation....at least noted separately in the NPD.

The 3rd comment re: "Secondary Equivalence" is possibly best understood by reviewing the attached letter recently released by OWQ to the Town of Lowell regarding this matter. In this instance a definition should be included in the NPD for Secondary Equivalence as well as wording on how it should be evaluated....again best served on a case by case basis to assure that it is tied to wet weather and possibly emergency application such as backup during conventional process failure, and not used for "growth" treatment.

If it would be helpful I would be happy to work w/ staff on this matter.

Don

Don Larson

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Thank you.

1/20/2009